

EXHIBIT 2

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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LGN INTERNATIONAL, LLC, and,
PRUDENT INVESTIMENTOS LTDA,

Plaintiffs,

No. 20-cv-3185-LGS

- against -

HYLAN ASSET MANAGEMENT, LLC,
ANDREW SHAEVEL,
BAHAMAS MARKETING GROUP,
JOEL TUCKER,
SQ CAPITAL, LLC,
JT HOLDINGS, INC.,
HPD LLC,
HIRSCH MOHINDRA,
MAINBROOK ASSET PARTNERS I, LLC,
WORLDWIDE PROCESSING GROUP LLC,
FRANK A. UNGARO, and
BABALAW VENTURES,

Defendants.
----- x

SWORN DECLARATION OF ANDREW SHAEVEL

I, ANDREW SHAEVEL, declare under penalty of perjury, under the laws of the United States of America that, to the best of my knowledge and belief, the following information is true and correct:

1. I am the former Chief Executive Officer of Hylan Asset Management, LLC (Hylan) and Mainbrook Asset Partners I, LLC (Mainbrook), which have both been dissolved. As the CEO of Hylan, I executed documents on behalf of Hylan as the manager of Hylan Debt Fund LLC (HDF), which has also been dissolved. I am currently the Chief Executive Officer of Bobalew LLC.

2. Joel Tucker has never had an ownership interest in Hylan, Mainbrook, HDF, Bobalew LLC, or any other entity in which I have had an ownership interest.

3. Mainbrook has never maintained a bank account in New York City. In fact, none of the aforementioned entities, including Mainbrook, Hylan, HDF, and Bobalew LLC have ever maintained a bank account in New York City, or the Southern District of New York.

DATED: February 11, 2021



ANDREW SHAEVEL